

EXHIBIT 14

MAO DECLARATION ISO PLAINTIFFS' MOTION FOR CLASS CERTIFICATION

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12 ZOOM VIDEOTAPED DEPOSITION OF
13 BELINDA LANGNER
14 Thursday, December 15, 2022
15 9:09 a.m. PST

18 REPORTED BY:
19 BELLE VIVIENNE, RPR, CRR, NJ-CRR,
20 WA/CO/NM-CCR
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25 PAGES 1 - 290

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2

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18 VIDEOGRAPHER:

19 Shawna Hynes

1 with Google and the Google Ads systems. 16:41:55
2 Q. With regard to these -- these 16:41:57
3 revenue streams, does Google make any 16:41:59
4 money from ad conversions, tracking ad 16:42:02
5 conversions? 16:42:08
6 A. So Google specifically and app 16:42:10
7 campaign specifically's goal is to 16:42:15
8 drive -- to drive users for these 16:42:18
9 advertisers that are more likely to 16:42:22
10 perform these specific actions. It is -- 16:42:23
11 and we do conversion measurement as a way 16:42:28
12 to show the value that the Google app 16:42:33
13 campaigns have brought to a specific 16:42:36
14 advertiser. 16:42:37
15 Q. What about conversions for when 16:42:38
16 SWAA is off, does Google make any money 16:42:41
17 off of that? 16:42:44
18 MR. SANTACANA: Vague. 16:42:45
19 A. I think we've sort of talked 16:42:53
20 about the sort of app measurement concept 16:42:55
21 already, right? So for the purposes of 16:42:57
22 advertising, Google wants to demonstrate 16:43:00
23 the value of our app campaigns, app 16:43:04
24 conversion measurement allows us to 16:43:09
25 demonstrate the value that Google Ads 16:43:10

1	drives for that specific advertiser.	16:43:13
2	BY MR. MAO:	16:43:13
3	Q. So then what's the purpose of	16:43:18
4	measuring a SWAA-off traffic for the	16:43:20
5	purposes of conversions for these revenue	16:43:23
6	streams?	16:43:28
7	A. When advertisers use app	16:43:52
8	campaigns, they want to know how well	16:43:55
9	their app campaigns are doing, just like	16:43:58
10	they would want to know how well their	16:44:00
11	campaigns on other ad networks are doing.	16:44:02
12	So across the board, advertisers do use	16:44:05
13	measurement platforms such as GA4F or	16:44:09
14	other ad app attribution partners to	16:44:15
15	measure the performance of their	16:44:20
16	campaigns, be it the Google app ads	16:44:21
17	campaigns or other campaigns. And the	16:44:26
18	whole purpose of that, right, is so that	16:44:28
19	advertisers understand how they should	16:44:31
20	distribute their budget between the	16:44:33
21	various different ad networks that they	16:44:36
22	are advertising with.	16:44:38
23	Q. And -- and they want to know	16:44:38
24	that information even when SWAA is off for	16:44:39
25	the user; isn't that correct?	16:44:42

1 A. App advertisers want to 16:44:49
2 understand how their app campaigns are 16:44:51
3 doing. In the context of app campaigns, 16:44:54
4 Google is -- Google Ads provides a service 16:44:57
5 to the advertiser to understand how their 16:45:00
6 specific ads are performing so that they 16:45:05
7 understand the value of their ad -- ads 16:45:08
8 and how they are spending their ad 16:45:11
9 budgets. 16:45:13

10 Q. Even when sWAA is off; is that 16:45:16
11 correct? 16:45:20

12 MR. SANTACANA: Asked and 16:45:23
13 answered. 16:45:24

14 A. As we mentioned earlier, app 16:45:28
15 conversion measurement can happen in the 16:45:32
16 pseudo-anonymous space when sWAA is off 16:45:38
17 because the conversion is happening on the 16:45:43
18 specific device. 16:45:45

19 BY MR. MAO: 16:45:45

20 Q. And advertisers want to know 16:45:48
21 that; is that correct? 16:45:49

22 A. I mean -- 16:45:52

23 MR. SANTACANA: Objection, calls 16:45:53
24 for speculation. 16:45:54

25 A. I -- I can't speak for 16:45:54

1	advertisers, right? But I assume they	16:45:55
2	want to know the value of their ad	16:46:00
3	campaigns, but I -- I can't speak for them	16:46:05
4	generally.	16:46:07
5	BY MR. MAO:	16:46:07
6	Q. When I go to page 7 of this, it	16:46:08
7	says "The problem: Holes in our ad	16:46:12
8	revenue tracking." You agree with me that	16:46:15
9	when there are holes in the advertisement	16:46:20
10	tracking, advertisers do not like that; is	16:46:24
11	that correct?	16:46:27
12	MR. SANTACANA: Objection,	16:46:28
13	misstates the document, calls for	16:46:28
14	speculation.	16:46:30
15	A. I mean, I -- I can't speak for	16:46:35
16	advertisers. So, you know, and --	16:46:37
17	BY MR. MAO:	16:46:37
18	Q. Sorry. Were you finished?	16:46:49
19	A. Yes.	16:46:51
20	Q. Do you know what the financial	16:46:55
21	impact on Google's ability to monetize off	16:46:57
22	of the revenue streams referenced over	16:47:08
23	back at page 5 would be if Google was not	16:47:15
24	able to measure sWAA or WAA-off traffic?	16:47:18
25	A. To the best of my knowledge, we	16:47:27

1 have never -- Google has never measured, 16:47:29
2 you know, the impact of sWAA-off traffic. 16:47:35
3 Q. Do you know whether or not that 16:47:40
4 would be a negative impact or positive 16:47:42
5 impact if Google was not able to track 16:47:45
6 sWAA-off traffic? 16:47:50
7 A. I wouldn't know for certain 16:47:51
8 without doing an experiment. 16:47:52
9 Q. Was an experiment ever 16:47:55
10 contemplated? 16:47:58
11 A. I don't recall serious 16:48:03
12 discussions around an experiment around 16:48:05
13 sWAA-off traffic. 16:48:08
14 Q. Or WAA-off traffic; is that 16:48:09
15 correct? 16:48:12
16 A. I don't recall an experiment -- 16:48:13
17 oh, I don't recall experiments being 16:48:22
18 discussed around the impact of WAA-off or 16:48:24
19 sWAA-off traffic to the best of my 16:48:31
20 knowledge. 16:48:33
21 Q. Got it. 16:48:33
22 Can you do me a favor and my 16:48:34
23 last questions are going to be on page 10, 16:48:37
24 it's the majority of ad -- app ads 16:48:40
25 revenue. 16:48:43

1 CERTIFICATION
2

3 I, BELLE VIVIENNE, a Nationally
4 Certified Realtime Reporter, do hereby
5 certify:

6 That the witness whose testimony as
7 herein set forth, was duly sworn by me;
8 and that the within transcript is a true
9 record of the testimony given by said
10 witness.

11 I further certify that I am not
12 related to any of the parties to this
13 action by blood or marriage, and that I am
14 in no way interested in the outcome of
15 this matter.

16 IN WITNESS WHEREOF, I have hereunto
17 set my hand this 19th day of December
18 2022.

19
20
21 *Belle Vivienne*
22

23 BELLE VIVIENNE, CRR, CCR, RPR
24
25